

Re: Grano v. State of NM, Case No. 1:20-cv-00147-PJK-KK

Joe Romero <joe@romerolawnm.com>

Fri 2/19/2021 4:25 PM

To: Eric Rodriguez <erodriguez@wabsa.com>; Rodney Gabaldon <rgabaldon@wabsa.com>

Cc: Meg Pettingill <mpettingill@wabsa.com>

Mr. Rodriguez and Mr. Gabaldon,

Plaintiff will stipulate to the proposed Motion and Protective Order. I will be filing an unopposed motion to extend pre-trial deadlines. I will circulate the motion and proposed Order for your final approval before I file. Thank you for your courtesy in agreeing to extend the deadlines pursuant to my request.

Once the stipulated Motion is filed and the Protective Order is entered would you please provide any documents that you may have been waiting to disclose pursuant to Rule 26(a)(1)(A). Thanks.

Joseph M. Romero
Attorney at Law
P.O. Box 27579
Albuquerque, NM 87125-7579
Phone: (505) 433-1642
Fax: (505) 214-5774
www.romerolawnm.com

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On Fri, Feb 19, 2021 at 2:05 PM Eric Rodriguez <erodriguez@wabsa.com> wrote:

Mr. Romero,

You have not confirmed that you received my correspondence, see attached. Please confirm, I'd like to make sure that our communications are going through.

In the meantime, please note our approval of your request to extend the deadlines set in the scheduling order by 60 days.

Respectfully, and I look forward to hearing from you.

Eric Rodriguez

From: Joe Romero <joe@romerolawnm.com>

Sent: Tuesday, February 16, 2021 4:41 PM

To: Eric Rodriguez <erodriguez@wabsa.com>; Rodney Gabaldon <rgabaldon@wabsa.com>

Subject: Grano v. State of NM, Case No. 1:20-cv-00147-PJK-KK

Dear Mr. Rodriguez and Mr. Gabaldon,

I believe that at the Rule 16 conference in November, the judge agreed that you could present the protective order your clients' requested. I am still waiting on the Order. Would you please send me your proposed order to review? I am also writing to request your concurrence in a motion to extend the deadlines set in the scheduling order by 60 days. Will your clients agree to this request? Finally, will you let me know when Gregg Marcantal can be available to be deposed? I would like to take his deposition before any of the other Defendants.

Thank you for your attention to this matter. I look forward to hearing from you.

Joseph M. Romero

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